

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- REVISED

PERMITTEE

Lake County Press, Inc.
Attn: Peter Douglas
98 Noll Street
Waukegan, Illinois 60085

Application No.: 04050021

I.D. No.: 097190AFK

Applicant's Designation:

Date Received: January 4, 2007

Subject: Lithographic Printing Presses

Date Issued: January 22, 2007

Expiration Date: January 27, 2010

Location: 98 Noll Street, Waukegan, Lake County

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of twelve non-heatset sheet-fed offset lithographic printing presses pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
 - i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for volatile organic material (VOM), 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for totaled HAPs). As a result, the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit.
 - ii. To limit the emissions of volatile organic materials (VOM) from the construction of emission units and other modifications at the source, which occurred without first obtaining construction permit(s) between November 15, 1992 and June 15, 2005 (the period during which the Chicago area was classified as severe nonattainment for ozone), to less than 25 tons/year. As a result the source is excluded from the requirements of 35 Ill. Adm. Code Part 203, Major Stationary Source Construction and Modification.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) for this location.
- 2a. This permit is issued based on this source not being a participating source in the Emissions Reduction Market System (ERMS), 35 Ill. Adm. Code Part 205, pursuant to 35 Ill. Adm. Code 205.200. This is based on the source's actual volatile organic material (VOM) emissions during the seasonal allotment period from May 1 through September 30 of each year being less than 10 tons and the source's baseline emissions also being less than 10 tons.

- b. The Permittee shall maintain the following records to allow the confirmation of actual VOM emissions during the seasonal allotment period:
 - i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as appropriate, to determine actual VOM emissions during the seasonal allotment period;
 - ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures that may be specified in this permit; and
 - iii. Total VOM emissions from the source, in tons, during each seasonal allotment period, which shall be compiled by November 30 of each year.
 - c. In the event that the source's VOM emissions during the seasonal allotment period equal or exceed 10 tons, the source shall become a participating source in the ERMS and beginning with the following seasonal allotment period, shall comply with 35 Ill. Adm. Code Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period, unless the source obtains exemption from the ERMS by operating with seasonal VOM emissions of no more than 15 tons pursuant to a limitation applied for and established in a Clean Air Act Permit Program (CAAPP) permit or a Federally Enforceable State Operating Permit (FESOP).
 - d. Pursuant to 35 Ill. Adm. Code 205.316(a), any participating or new participating source shall not operate without a CAAPP permit or FESOP. Pursuant to 35 Ill. Adm. Code 205.316(a)(2), if a participating or new participating source does not have a CAAPP permit containing ERMS provisions and the source elects to obtain a permit other than a CAAPP permit, the source shall apply for and obtain a FESOP that contains, in addition to other necessary provisions, federally enforceable ERMS provisions, including baseline emissions, allotment for each seasonal allotment period, identification of any units deemed to be insignificant activities for purposes of the ERMS, emissions calculation methodologies, and provisions addressing all other applicable requirements of 35 Ill. Adm. Code Part 205.
3. This permit is issued based on the lithographic printing presses being subject to the emission limitations and control requirements of 35 Ill. Adm. Code 218.407 and shall comply with the following requirements:
 - a. The VOM content of the as-applied fountain solution is:
 - i. 5 percent or less, by volume; or

- ii. 8.5 percent or less, by volume, and the temperature of the fountain solution are maintained below 15.6°C (60°F), measured at the reservoir or the fountain tray.
 - b. The cleaning solutions as used on the presses:
 - i. Has the VOM content less than or equal to 30% by weight; or
 - ii. Has the VOM composite partial vapor pressure less than 10 mmHg at 20°C (68°F).
 - c. The VOM containing cleaning materials, including used cleaning towels, associated with any lithographic printing line are kept, stored or disposed of in any manner other than in closed containers.
- 4. This permit is issued based on the coating operations being subject to the VOM emission limitations of 35 Ill. Adm. Code 218.204(c). The VOM content of the coatings, as applied, shall not exceed 2.3 lb/gal excluding water and any compounds which are specifically exempted from the definition of VOM, pursuant to 35 Ill. Adm. Code 218.204(c).
- 5. The VOM emissions from the printing presses shall not exceed 3.0 tons/month and 23.9 tons/year from the presses constructed before June 15, 2005 and 1.0 ton/month and 9.0 tons/year from the press constructed after June 15, 2006. The VOM emissions shall be calculated using the following equation:

$$E = \sum (I \times V_I \times 0.05) + \sum (S_m \times V_m \times 0.5) + \sum (S \times V),$$

where;

E - VOM emissions (tons)

I - Ink usage (tons)

V_I - VOM content of the ink (weight fraction)

S_m - Manual cleaning solvent usage with vapor pressure less than 10 mmHg (tons)

V_m - VOM content of manual cleaning solvent with vapor pressure less than 10 mmHg (weight fraction)

S - Coating, varnish, fountain solution and other cleaning solvents usage (tons)

V - VOM content of coating, varnish, fountain solution and other cleaning solvents (weight fraction)

These limits are based on the maximum production rate, 95% ink's VOM retention and 50% VOM retention of manual cleaning solvent with vapor

pressure less than 10 mmHg. Compliance with annual limits shall be determined from a running total of 12 months of data.

6. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in a rule which would require the Permittee to obtain a CAAPP permit from the Agency. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Agency.
7. The Permittee shall comply with the following monitoring requirements of 35 Ill. Adm. Code 218.410:
 - a. To install, maintain, and continuously operate a temperature monitor of the fountain solution in the reservoir or fountain tray, as applicable;
 - b. The temperature monitor must be capable of reading with an accuracy of 0.3°C or 0.5°F, and must be attached to an automatic, continuous recording device such as a strip chart, recorder, or computer, with at least the same accuracy, that is installed, calibrated and maintained in accordance with the manufacturer's specifications.
8. The Permittee shall maintain records of the following items:
 - a. The name and identification of each batch of fountain solution prepared for use on one or more lithographic printing lines, the lithographic printing line(s) or centralized reservoir using such batch of fountain solution, and the applicable VOM content limitation for the batch;
 - b. Date and time of preparation and each subsequent modification of the batch of fountain solution;
 - c. Volume and VOM content of each component used in, or subsequently added to, the fountain solution batch;
 - d. Calculated VOM content of the as-applied fountain solution;
 - e. The temperature of the fountain solution at each printing line;
 - f. The name and identification of each cleaning solution;
 - g. Date and time of preparation, and each subsequent modification, of the batch of cleaning solution;
 - h. The VOM content of each cleaning solvent in the cleaning solution;

- i. The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent;
9. The Permittee shall maintain separate monthly records of the following items for the presses constructed before and after June 15, 2006:
 - a. Names and amounts of inks, fountain solutions, coatings and clean-up solvents used (tons/month, tons/year) and their VOM and HAP content (weight %); and
 - b. Certified records of amount of waste solvent shipped-off (tons) and its VOM and HAP content (weight %);
 - c. VOM and HAP emissions with supporting calculations (tons/month, tons/year).
10. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five years from the date of entry and shall be made available for inspection and copying by the Illinois EPA and USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.
11. If there is an exceedance of or deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance/deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.
12. Two (2) copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance and Enforcement Section (#40)
P.O. Box 19276
Springfield, IL 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

It should be noted that this permit has been revised to include operation of the new printing press described in Construction Permit 06110036.

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If you have any questions on this permit, please call Valeriy Brodsky at 217/782-2113.

Edwin C. Bakowski, P.E.
Acting Manager, Permit Section
Division of Air Pollution Control

ECB:VJB:cjc

cc: IEPA, FOS Region 1
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from printing plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Agency used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels (100 tons per year of VOM, 10 tons/year for a single HAP and 25 tons/year for totaled HAPs) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is used and control measures are more effective than required in this permit.

<u>Emission Units</u>	E M I S S I O N S (tons/year)		<u>Total HAP</u>
	<u>VOM</u>	<u>Single HAP</u>	
Lithographic presses	32.9	< 10	< 25

ECB:VJB:cjc